

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Leontyne Kelly Jones, Debtor

**Case No. 25-00124-JAW
CHAPTER 13**

NOTICE

Debtor has filed papers with the court to incur new debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran U.S. Courthouse
501 E. Court St., Suite 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr.
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Incur New Debt.

Date: July 15, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Leontyne Kelly Jones, Debtor

**Case No. 25-00124-JAW
CHAPTER 13**

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 01/15/2025.
2. Debtor is paying approximately 100% to General Unsecured Debts through the plan.
3. Debtor plans to attend Holmes Community College to continue her education to obtain a Licensed Practical Nurse (LPN) degree. She intends to enroll in the Fall 2024, Winter 2025, and Summer 2025 semesters.
4. Debtor is currently employed as a lab technician, earning approximately \$40,000 per year. By obtaining a LPN degree, she could potentially increase her annual income to around \$70,000.
5. Debtor seeks to obtain financial aid in the amount of \$6,000.00, to be disbursed in approximately \$2,000.00 increments per semester to complete her nursing degree.
6. Debtor will repay this debt directly to the lender in accordance with the terms of their agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the foregoing was forwarded on July 11, 2025, to the creditor, case trustee and U.S. Trustee as indicated in the “21-day notice” that accompanies this Motion.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Bankruptcy Court for the SOUTHERN DISTRICT OF MISSISSIPPI by using the CM/ECF system. I certify that the U.S. Trustee and Trustee appointed to this case are registered CM/ECF users and that service to these individuals will be accomplished by the CM/ECF system.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

LEONTYNE KELLY JONES

CASE NO: 25-00124-JAW

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/15/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Incur New Debt

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/15/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. 103469

The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
LEONTYNE KELLY JONES

CASE NO: 25-00124-JAW

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 7/15/2025, a copy of the following documents, described below,
Notice and Motion to Incur New Debt

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/15/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 25-00124-JAW
SOUTHERN DISTRICT OF MISSISSIPPI
TUE JUL 15 9-43-52 PST 2025

CAPITAL ONE AUTO FINANCE A DIVISION OF
CAPI
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

AFFIRM INC
ATTN BANKRUPTCY
650 CALIFORNIA ST
SAN FRANCISCO CA 94108-2716

AIDVANTAGE ON BEHALF OF THE DEPARTMENT
OF ED
DEPT OF ED LOAN SERVICES
PO BOX 300001
GREENVILLE TX 75403-3001

AVANT
222 NORTH LASALLE ST
SUITE 1600
CHICAGO IL 60601-1112

CAPITAL ONE
ATTN BANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CAPITAL ONE AUTO
ATTN BANKRUPTCY
7933 PRESTON RD
PLANO TX 75024-2359

CAPITAL ONE AUTO FINANCE
A DIVISION OF CAPITAL ONE NA
AIS PORTFOLIO SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

CAPITAL ONE AUTO FINANCE
A DIVISION OF CAPITAL ONE NA
CO AIS PORTFOLIO SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

COMENITY CAPITAL
ATTN BANKRUPTCY
PO BOX 182125
COLUMBUS OH 43218-2125

COMENITYMPRC
ATTN BANKRUPTCY
PO BOX 182125
COLUMBUS OH 43218-2125

CREDIT COLLECTION
ATTN BANKRUPTCY
725 CANTON ST
NORWOOD MA 02062-2679

(P)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

KOALAFI
ATTN BANKRUPTCY
PO BOX 5518
GLEN ALLEN VA 23058-5518

MAGNOLIA FEDERAL CREDIT UNION
240 BRIARWOOD DRIVE
JACKSON MS 39206-3027

MIDLAND CREDIT MANAGEMENT INC
PO BOX 2037
WARREN MI 48090-2037

MIDLAND CREDIT MGMT
ATTN BANKRUPTCY
PO BOX 939069
SAN DIEGO CA 92193-9069

NAVIENT
ATTN BANKRUPTCY
PO BOX 9635
WILKES BARRE PA 18773-9635

NAVY FEDERAL CU
ATTN BANKRUPTCY
PO BOX 3000
MERRIFIELD VA 22119-3000

QUANTUM3 GROUP LLC AS AGENT FOR
COMENITY CAPITAL BANK
PO BOX 788
KIRKLAND WA 98083-0788

SANTANDER CONSUMER USA
1601 ELM ST SUITE 800
DALLAS TX 75201-7260

SANTANDER CONSUMER
ATTN BANKRUPTCY
PO BOX 961245
FORT WORTH TX 76161-0244

SMITH ROUCHON
1456 ELLIS AVE
JACKSON MS 39204-2204

SYNCHRONY BANK
ATTN BANKRUPTCY
PO BOX 965060
ORLANDO FL 32896-5060

(P)TD BANK USA N A
ATTN CO WEINSTEIN RILEY P S
1415 WESTERN AVE
SUITE 700
SEATTLE WA 98101-2051

TARGET
PO BOX 9475
MINNEAPOLIS MN 55440-9475

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430
JACKSON MS 39201-5022~~

VERIZON
BY AIS INFOSOURCE LP AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

DEBTOR

LEONTYNE KELLY JONES
922 SULPHUR SPRINGS RD
CANTON MS 39046-9570

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

~~EXCLUDE~~

~~TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201-1902~~